

**U.S. DISTRICT COURT**

**EASTERN DISTRICT OF TEXAS**

Mr. Michael Moates;

Case No.: 4:20-cv-00896

DC Chronicle;

DC Chronicle Limited

## **Plaintiffs**

V.

Facebook Inc.;

AT&T

## Defendants

## **MOTION FOR LEAVE TO FILE**

## **AMENDED COMPLAINT**

**FILED**

OCT 27 2021

Clerk, U.S. District Court  
Eastern District of Texas

Plaintiff Michael Moates hereby requests this court grant an order allowing for the Plaintiff Michael Moates to file an amended complaint for the following reasons:

19 1. Party AT&T is being dismissed.

20 2. Plaintiff DC Chronicle and DC Chronicle Limited are going to pursue separate action in small

21 claims court.

22 3. Plaintiff DC Chronicle and DC Chronicle Limited cannot be represented pro se, as this court,

23 previously acknowledged<sup>1</sup>.

24 4. This case has been removed to federal court and as such the pleading will be approached in

25 accordance with the Federal Rules of Civil Procedure and Federal Rules of Evidence.

<sup>1</sup> Moates v Facebook - Case 4:20-cv-00896-ALM-KPJ - DK. 12

1 5. New evidence that is vital to this case has come to light since the petition was filed.

2 Request order Prior to Ruling  
3 on Transfer Motion

4  
5  
6  
7 Michael Moates  
8 2700 Colorado Boulevard #1526  
9 Denton, TX 76210  
10 (817)999-7534  
11  
12 [michael.moates@thenarrativetimes.org](mailto:michael.moates@thenarrativetimes.org)

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16 **CERTIFICATE OF SERVICE**  
17

18 The undersigned hereby certifies that all counsel of record who are deemed to have consented to  
19 electronic service are being served with this document via email pursuant to Local Rule CV-5.

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